## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	) Chapter 11
LIGADO NETWORKS LLC, et al., 1	) Case No. 25-10006 (TMH)
Debtors.	) (Joint Administration Requested)

NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS
AND RELATED DOCUMENTS AND (II) AGENDA FOR HEARING
ON FIRST DAY MOTIONS SCHEDULED FOR JANUARY 7, 2025
AT 2:00 P.M. (EASTERN STANDARD TIME), BEFORE THE
HONORABLE THOMAS M. HORAN, AT THE UNITED STATES BANKRUPTCY
COURT FOR THE DISTRICT OF DELAWARE, 5<sup>TH</sup> FLOOR, COURTROOM 4<sup>2</sup>

This proceeding will be conducted in person and utilizing Zoom. Any party that is not in Delaware is not expected to travel.

Please refer to Judge Horan's Chambers Procedures and the Court's website (<a href="http://www.deb.uscourts.gov/ecourt-appearances">http://www.deb.uscourts.gov/ecourt-appearances</a>) for information on the method of allowed participation (video or audio), Judge Horan's expectations of remote participants, and the advance registration requirements.

Registration is required one-hour prior to the hearing unless otherwise noticed using the eCourt Appearances tool available on the Court's website.

PLEASE TAKE NOTICE that on January 5, 2025, the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") filed the following voluntary petitions (collectively, the "<u>Petitions</u>") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532:

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Ligado Networks LLC (3801); ATC Technologies, LLC (N/A); Ligado Networks (Canada) Inc. (N/A); Ligado Networks Build LLC (N/A); Ligado Networks Corp. (N/A); Ligado Networks Finance LLC (N/A); Ligado Networks Holdings (Canada) Inc. (N/A); Ligado Networks Inc. of Virginia (9725); Ligado Networks Subsidiary LLC (N/A); One Dot Six LLC (8763); and One Dot Six TVCC LLC (N/A). The Debtors' headquarters is located at: 10802 Parkridge Boulevard, Reston, Virginia 20191.

All motions and other pleadings referenced herein are available online at the following address: https://omniagentsolutions.com/Ligado.

## A. <u>Voluntary Petitions</u>:

- 1. Ligado Networks LLC
- 2. Ligado Networks (Canada) Inc.
- 3. <u>Ligado Networks Holdings (Canada) Inc.</u>
- 4. Ligado Networks Corp.
- 5. Ligado Networks Subsidiary LLC
- 6. ATC Technologies, LLC
- 7. Ligado Networks Build LLC
- 8. Ligado Networks Finance LLC
- 9. <u>Ligado Networks Inc. of Virginia</u>
- 10. One Dot Six LLC
- 11. One Dot Six TVCC LLC

PLEASE TAKE FURTHER NOTICE that in addition to filing the Petitions, the Debtors filed the following first day motions and related documents (collectively, the "<u>First Day Motions</u>"):

## B. <u>First Day Declaration</u>:

12. Declaration of Douglas Smith, Chief Executive Officer of Ligado Networks LLC, in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 2; filed January 6, 2025]

## C. First Day Motions:

- 13. Debtors' Motion for Entry of an Order (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief [Docket No. 3; filed January 6, 2025]
- 14. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral; (II) Granting Liens and Superpriority Administrative Expense Claims; (III) Granting Adequate Protection; (IV) Modifying the Automatic Stay; (V) Scheduling a Final Hearing; and (VI) Granting Related Relief [Docket No. 4; filed January 6, 2025]
  - i. Declaration of Bruce Mendelsohn in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Them to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Superpriority Administrative Expense Claims, (III) Modifying the Automatic Stay, (IV) Granting Adequate Protection, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief [Docket No. 6; filed January 6, 2025]

- 15. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Cash Management System and Maintain Existing Bank Accounts, (B) Utilize Their Credit Cards, and (C) Engage in Intercompany Transactions, (II) Granting a Waiver of the Requirements of Section 345(b) of the Bankruptcy Code and U.S. Trustee Guidelines, and (III) Granting Related Relief [Docket No. 7; filed January 6, 2025]
- 16. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and Fees and (II) Granting Related Relief [Docket No. 11; filed January 6, 2025]
- 17. Debtors' Motion for Entry of Interim and Final Orders (I) Approving the Proposed Adequate Assurance of Payment for Future Utility Services and Related Procedures, (II) Prohibiting Utility Companies to Alter, Refuse, or Discontinue Services, and (III) Granting Related Relief [Docket No. 13; filed January 6, 2025]
- 18. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Maintain Insurance Policies and Surety Bond Program and Honor Obligations Thereunder, and (B) Renew, Amend, Supplement, Extend, or Purchase Insurance Policies and Surety Bonds, and (II) Granting Related Relief [Docket No. 14; filed January 6, 2025]
- 19. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing Them to (A) Satisfy Prepetition Obligations on Account of Compensation and Benefits Programs and (B) Continue Compensation and Benefits Programs, and (II) Granting Related Relief [Docket No. 15; filed January 6, 2025]
- 20. Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Redact Certain Personal Identification Information and (II) Granting Related Relief [Docket No. 16; filed January 6, 2025]
- 21. Debtors' Motion for Entry of an Order Authorizing Ligado Networks LLC to Act as Foreign Representative Pursuant to 11 U.S.C. § 1505 [Docket No. 17; filed January 6, 2025]
- 22. Application of Debtors for Entry of an Order (I) Authorizing and Approving the Appointment of Omni Agent Solutions, Inc. as Claims and Noticing Agent and (II) Granting Related Relief [Docket No. 18; filed January 6, 2025]

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the First Day Motions is scheduled for January 7, 2025 at 2:00 p.m. (Eastern Standard Time) before The Honorable Thomas M. Horan, United States Bankruptcy Judge for the District of Delaware (the "First Day Hearing"). Parties who wish to participate in the First Day Hearing may do so by registering for the Zoom hearing at: <a href="http://www.deb.uscourts.gov/ecourt-appearances">http://www.deb.uscourts.gov/ecourt-appearances</a>.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Motions may be made at the First Day Hearing.

Dated January 6, 2025 Wilmington, Delaware /s/ Michael J. Merchant

Mark D. Collins, Esq. (Bar No. 2981) Michael J. Merchant, Esq. (Bar No. 3854) Amanda R. Steele, Esq. (Bar No. 5530) Emily R. Mathews, Esq. (Bar No. 6866)

RICHARDS, LAYTON & FINGER, P.A.

One Rodney Square 920 North King Street Wilmington, DE 19801

Telephone: (302) 651-7700 Facsimile: (302) 651-7701 Email: collins@rlf.com

merchant@rlf.com steele@rlf.com mathews@rlf.com

-and-

Dennis F. Dunne, Esq. (*pro hac vice* pending) Matthew L. Brod, Esq. (*pro hac vice* pending) Lauren C. Doyle, Esq. (*pro hac vice* pending)

**MILBANK LLP** 

55 Hudson Yards

New York, New York 10001 Telephone: (212) 530-5000 Facsimile: (212) 530-5219

Email: ddunne@milbank.com

mbrod@milbank.com ldoyle@milbank.com

Andrew M. Leblanc, Esq. (pro hac vice pending)

MILBANK LLP

1850 K Street, NW

Suite 1100

Washington DC 20006

Telephone: (202) 835-7500 Facsimile: (202) 263-7586

Email: aleblanc@milbank.com

Proposed Co-Counsel for Debtors in Possession